

**IN THE UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

In Re:

JOHNNY DARRELL LORICK

Debtor(s)

CASE NO. 19-00252-JJG-13

Chapter 13

Judge Jeffrey J. Graham

**OBJECTION TO AMENDED
CHAPTER 13 PLAN**

Creditor, Colonial National Mortgage, a Division of Colonial Savings, FA (“Creditor”), by and through counsel, hereby objects to the proposed Chapter 13 Plan filed by the Debtor. This Objection is hereby supported by the following Memorandum.

Respectfully Submitted

/s/ Martha R. Spaner

Martha R. Spaner
Attorney for Creditor
Reisenfeld & Associates LLC
3962 Red Bank Road
Cincinnati, OH 45227
voice: (513) 322-7000
facsimile: (513) 322-7099
e-mail: inbk@rslegal.com

MEMORANDUM

Creditor holds a Mortgage on the real estate located at 6445 Harrison Ridge Blvd, Indianapolis, IN 46236. Creditor filed a Proof of Claim on May 13, 2019, claim #5-2 listing an arrearage of \$81,008.96 and a balance of \$250,427.58. The subject property is Debtors primary residence and Debtor cannot change the amount owed, interest rate, or other terms of a first mortgage. (11 U.S.C. 1322(b)(2)). Creditor is not opposed to the Debtor selling the peroperty, as long as the sale pays off the Creditor's lien in full, however the plan as currently proposed does not protect the interest of the Creditor while the Debtor tries to market the property.

The Amended Chapter 13 Plan as proposed herein does not adequately protect the Creditors' interest in said real estate.

WHEREFORE, Creditor requests that confirmation be denied.

/s/ Martha R. Spaner

Martha R. Spaner
Attorney for Creditor
Reisenfeld & Associates LLC
3962 Red Bank Road
Cincinnati, OH 45227
voice: (513) 322-7000
facsimile: (513) 322-7099
e-mail: inbk@rslegal.com

CERTIFICATE OF SERVICE

I certify that on January 15, 2020, a true and correct copy of the Objection to Amended Plan was served:

Via the court's Electronic Case Filing System on these entities and individuals who are listed on the court's Electronic Mail Notice List:

Michael J. Norris, Debtor`s Counsel
mike@mikenorrislaw.com

Ann M. DeLaney, Bankruptcy Trustee
ECFdelaney@trustee13.com

U.S. Trustee
(Registered Address)@usdoj.gov

And by regular U.S. Mail, postage prepaid on:

Johnny Darrell Lorick, Debtor
6445 Harrison Ridge Blvd.
Indianapolis, IN 46236

/s/ Martha R. Spaner

Martha R. Spaner
Attorney for Creditor
Reisenfeld & Associates LLC
3962 Red Bank Road
Cincinnati, OH 45227
voice: (513) 322-7000
facsimile: (513) 322-7099
e-mail: inbk@rslegal.com